

DAVE M. McGRAW (State Bar No. 86389)
PATRICK K. McCLELLAN (State Bar No. 77352)
LAW OFFICES OF DAVE M. McGRAW
A Professional Corporation
2890 North Main Street, Suite 307
Walnut Creek, California 94597-2738
(925) 944-0206

Attorneys for Movant
WACHOVIA MORTGAGE, FSB
fka: World Savings Bank, FSB, its successors and/or assigns

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re)	Case No. 09-12558
)	Chapter 7
ROSA M. REYNOSO,)	R.S. No. DMM-15406
aka: Rosa M. G. Reynoso)	First Deed: 5751 Ambush Ridge Drive
)	
)	MOTION FOR RELIEF FROM STAY
)	(Rule 4001)
)	
Debtor.)	Date: November 12, 2009
)	Time: 9:00 a.m.
)	Judge: Alan Jaroslovsky
)	Ctrm: The Courtroom
)	Place: U.S. Bankruptcy Court
)	99 South E Street, Santa Rosa, CA

TO THE COURT AND TO ALL INTERESTED PARTIES:

WACHOVIA MORTGAGE, FSB, will and hereby does move the court for an order terminating the automatic stay provisions of 11 U.S.C. §362 and permitting Movant to continue to exercise its lien enforcement rights under the deed of trust described in the accompanying declaration and for attorney's fees incurred herein.

Said motion is made on the grounds that debtor's estate has no realizable equity in said real property, that the property is not necessary for an effective reorganization of debtor herein, and that Movant is not adequately protected.

1 In addition, Movant specifically seeks to nullify the effect of Bankruptcy Rule 4001
2 (a)(3).

3 This motion is based on the papers and pleadings on file herein, the attached Declaration
4 of Stephanie P. Gonzales in Support of Motion for Relief From Stay, which is incorporated
5 herein by reference.
6

7 Dated: October 27, 2009

LAW OFFICES OF DAVE M. McGRAW

9 /s/ Dave M. McGraw

10 DAVE M. McGRAW

11 Attorneys for Movant
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28